



United States Department of Justice

United States Attorney  
Northern District of New York

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April 26, 2024

**VIA CM/ECF**

Hon. Thérèse Wiley Dancks  
U.S. Magistrate Judge  
Federal Building and U.S. Courthouse  
P.O. Box 7346  
Syracuse, New York 13261-7346

Re: *Long et al. v. U.S. ICE & U.S. CBP*: Joint Status Report  
Civil Action No.: 5:23-CV-1564 (DNH/TWD)

Dear Judge Dancks:

This office represents Defendants in this Freedom of Information Act (“FOIA”) case. Please accept this letter as a report on the conference as a joint status report as required by this Court’s Text Order dated April 3, 2024. *See* Dkt. # 22. The parties have continued to explore potential resolution of this matter. On April 19, 2024, Plaintiffs provided Defendants with a written proposal. Defendants are currently internally reviewing the proposal to determine how to proceed. On April 25, 2024, counsel for the parties held a meet-and-confer to discuss some discrete points of the proposal.

Therefore, the parties jointly and respectfully request that this Court enter an Order directing the parties to file a joint status report on or before May 13, 2024 regarding the status of their discussions.

CARLA B. FREEDMAN  
United States Attorney

By: \_\_\_\_\_/s/  
David M. Katz  
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